

## UNITED STATES DISTRICT COURT

for the

WESTERN District of TEXAS**FILED**

July 10, 2024

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXASUnited States of America  
v.BY: CM  
DEPUTY(1) Jonathan Lumbreras  
(2) Edward Clinton Smith

Case No. SA:24-MJ-995

Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 7, 2024 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*21 USC §§ 846, 841(a)(1)  
& (b)(1)(B)Conspiracy to Possess with Intent to Distribute a Controlled Substance;  
and Possession with Intent to Distribute 500 grams or more of cocaine.Penalties: 5-40 Years Imprisonment' \$5 Million Fine; Minimum 4 Years  
Supervised Release; and \$100 Mandatory Special Assessment.

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.*Complainant's signature*

SA Charlie Davidson, FBI

*Printed name and title*

- ☐
- Sworn to before me and signed in my presence.
- 
- ☒
- Sworn to telephonically and signed electronically.

*Judge's signature*Date: July 10, 2024City and state: San Antonio, Texas

Richard B. Farrer, U.S. Magistrate Judge

*Printed name and title*

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, FBI Special Agent Charlie Davidson, being duly sworn do hereby depose and state:

1. I am FBI Agent assigned to the San Antonio FBI Safe Streets Task Force. I have participated in drug investigations and other violent crime investigations, during which, I have conducted physical and electronic surveillance, executed search warrants, debriefed Confidential Human Sources, and reviewed of recorded conversations and criminal records. My primary duty and current assignment is conducting investigations targeting violent gangs and individuals involved in illegal activities as members of drug trafficking criminal enterprises. Among other duties, I am currently involved in an investigation focusing on the illegal activities of members and/or associates of the various criminal gangs in San Antonio, Texas, and the surrounding areas.
2. A credible and reliable FBI Confidential Human Source (CHS) has been communicating with Jonathan LUMBRERAS through an encrypted application called Threema. LUMBRERAS was using Threema username George, with account identifier TR57Z32D. The CHS previously communicated with LUMBRERAS on this Threema account to send messages and conduct telephone conversations. LUMBRERAS is on federal supervised release after being convicted of Conspiracy to Possess with Intent to Distribute Cocaine in the Western District of Texas in 2022.
3. On July 9, 2024, the CHS communicated with LUMBRERAS on LUMBRERAS' Threema account to arrange the purchase of two kilograms of cocaine. The CHS stated, "Need one asap...before my guy goes somewhere else." LUMBRERAS replied, "I got you like by 12 doe that's when they here." They continued to message regarding timing of the delivery. CHS messaged, "any word...ready for 2." LUMBRERAS replied, "yeah right at 12." At 12:57 P.M., LUMBRERAS replied, "it's there their getting it out...There about ready I got for sure just got here a little late...it's A1 Player Shit." At 1:29 P.M., LUMBRERAS replies, "like 45 minutes...Running a little late." CHS replies, "All good As long as the (fire emoji)."
4. At 2:06 P.M., LUMBRERAS called the CHS via Threema to continue to coordinate the timing and location of the delivery of two kilograms of cocaine. LUMBRERAS and the CHS agreed to do the delivery at the McDonald's at Walters and IH-35 in San Antonio. In April 2024, FBI agents coordinated two different controlled purchases at this location between the CHS and LUMBRERAS. On both occasions, LUMBRERAS sent Co-Conspirator-1 to deliver the cocaine to the CHS. On each occasion, Co-Conspirator-1 delivered about one-half kilogram of cocaine to the CHS.

5. After the call, FBI agents observed Edward SMITH meet with Co-Conspirator-1 in front of a residence on the 700 block of Porter Street in San Antonio. During the investigation, agents have identified SMITH and Co-Conspirator-1 as narcotics distributors for LUMBRERAS. SMITH met Co-Conspirator-1 at Co-Conspirator-1's vehicle and appeared to show them a bag. Co-Conspirator-1 and SMITH then departed the location in separate cars following one another in tandem in towards the negotiated delivery location arranged by CHS and LUMBRERAS.
6. Soon after, Texas Department of Transportation marked stopped SMITH and searched his vehicle. During the search, agents found a bundle of suspected cocaine that weighed approximately 1,195.7 grams and field tested positive for cocaine. SMITH also had 40 smaller individually packaged quantities of suspected cocaine that were packaged consistent with distribution.
7. In sum, the CHS communicated with LUMBRERAS to order two kilograms of cocaine after which LUMBRERAS then coordinated with SMITH and Co-Conspirator-1 to deliver those narcotics to the CHS at the arranged location. SMITH was stopped before he could deliver the narcotics and the cocaine was seized.
8. Based on the above facts, your affiant believes there is probable cause that **Jonathan LUMBRERAS** and **Edward Clinton SMITH** conspired to possess with intent to distribute 500 grams or more of cocaine, violation of 21 U.S.C. §§ 846, 841(a)(1), & 841(b)(1)(B).



FBI Special Agent Charlie Davidson  
Federal Bureau of Investigation – Safe Streets Task Force

Subscribed and sworn to telephonically on July 10, 2024.



HONORABLE JUDGE RICHARD B. FARRER  
UNITED STATES MAGISTRATE JUDGE